EXHIBIT A

I.   **Requests Regarding Various Servicing Processes, Investigations, Litigation, Audits, Etc.**

REQUEST No. 4: Copies of all forms and/or templates of promissory notes entered into by any borrower in connection with any and all loans ever held and/or serviced by Defendants.
REQUEST No. 22: All documents, including correspondence, regarding any analysis, determination, investigation, strategy, policy, directive, and/or decision by Defendants concerning the manner by which interest on student loans is capitalized.
REQUEST No. 23: All documents, including correspondence, regarding any analysis, determination, investigation, strategy, policy, directive, and/or decision by Defendants concerning the manner by which payments by a student loan borrower are allocated by Defendants to different types and/or programs of loans.
REQUEST No. 24: All documents, including correspondence, regarding any analysis, determination, investigation, strategy, policy, directive, and/or decision by Defendants concerning the manner by which payments by a student loan borrower are allocated by Defendants to loans with higher versus lower interest rates.
REQUEST No. 25: Any and all documents related to the process for the creation of monthly billing statements (e.g., templates, information chosen to be included or excluded, layout, font size, etc.) for all loans held and/or serviced by Defendants.
REQUEST No. 28: Any and all documents used to determine/calculate payment schedules for , Plaintiffs' Loans and all other loans serviced by Defendants, including, without limitation, amortization schedules.
REQUEST No. 29: Any and all documents related to the process for the creation of monthly billing statements (e.g., templates, information chosen to be included or excluded, layout, font size, etc.) for all loans held and/or serviced by Defendants.
REQUEST No. 31: Any and all schedules, guides, prompts, decision trees, flow charts, call scripts or other materials that are used by Defendants' customer service/call center/Customer Advocate employees that have been used from 2000 to the present to guide the customer service/call center/Customer Advocate employees' responses to student loan debtors complaints/grievances or questions.
REQUEST No. 34: All documents that refer or relate to Defendants' investigation of inquiries made by any of student loan borrower regarding or concerning the allocation of regular payments to principal versus interest.
REQUEST No. 35: All documents that refer or relate to Defendants' investigation of inquiries made by any of student loan borrower regarding or concerning the allocation of advance payments to principal versus interest.
REQUEST No. 37: All documents that refer or relate to the Defendants' investigation of inquiries made by any of student loan borrower regarding or concerning the allocation of advance payments to specific types of loans.
REQUEST No. 38: All documents that refer or relate to Defendants' investigation of inquiries made by any of student loan borrower regarding or concerning the allocation of regular payments to loans of higher versus lower interest rates.

REQUEST No. 40: All internal audit reports conducted by Defendants related to loan servicing processes for the years 2000 through the present.
REQUEST No. 41: All audit reports conducted by a third-party related to Defendants' loan servicing processes for the years 2000 through the present.
REQUEST No. 43: All documents, including communications, that refer or relate to Defendants' internal audit reports related to loan servicing processes for the years 2000 through the present.
REQUEST No. 45: All documents that refer or relate to Defendants' processes and/or policies for implementing automatic debit and/or automatic payment of monthly loan payments.
REQUEST No. 46: All documents that refer or relate to Defendants' investigation of inquiries made by any of student loan borrower regarding or concerning the allocation of regular payments to loans of higher versus lower interest rates.
REQUEST No. 47: All documents that refer or relate to Defendants' investigation of inquiries made by any student loan borrower regarding or concerning the allocation of advance payments to loans of higher versus lower interest rates.
REQUEST No. 50: All documents that refer or relate to Defendants' loan servicing processes for the years 2000 through the present.
REQUEST No. 51: All documents, including communications, that refer or relate to Defendants' internal audit reports related to loan servicing processes for the years 2000 through the present.
REQUEST No. 53: All documents that refer or relate to Defendants' response to the August 13, 2019 U.S. Congressional letter from Elijah E. Cummings (Chairman of the Committee on Oversight and Reform), Robert C. Scott (Chairman of the Committee on Education and Labor), and Maxine Waters (Chairwoman of the Committee on Financial Services) to John Remondi, President and Chief Executive Officer of Navient Solutions, LLC.
REQUEST No. 54: All documents that refer or relate to Defendants' processes and/or policies for implementing automatic debit and/or automatic payment of monthly loan payments.
REQUEST No. 57: All of Defendants' Board committee and sub-committee meeting minutes for the years 2000 through the present relating to policies and procedures concerning: (a)   loan servicing; (b)   federal and state law and regulatory compliance;
REQUEST No. 61: All contracts and agreements between Defendants and any third-party vendors relating to the implementation and/or facilitation of Defendants' loan servicing for the years 2000 through the present.
REQUEST No. 62: All communications that refer or relate to Defendants and any third-party vendors relating to the implementation and/or facilitation of Defendants' loan servicing for the years 2000 through the present.
REQUEST No. 65: All documents that refer or relate to Defendants' response to the audit conducted by the United States Department of Education, Office of the Inspector General for Federal Student Aid and report titled: Federal Student Aid: Additional Actions Needed to Mitigate the Risk of Servicer Noncompliance with Requirements for Servicing Federally Held Student Loans, dated February 12, 2019, and available at: https://www2.ed.gov/about/offices/list/oig/auditreports/fy2019/a05q0008.pdf.
REQUEST No. 67: All documents that refer or relate to Defendants' response to the August 13, 2019 U.S. Congressional letter from Elijah E. Cummings (Chairman of the Committee on Oversight and Reform), Robert C. Scott (Chairman of the Committee on Education and Labor),

and Maxine Waters (Chairwoman of the Committee on Financial Services) to John Remondi, President and Chief Executive Officer of Navient Solutions, LLC.

REQUEST No. 71: All documents reflecting the provision, issuance, or communication of any instruction, requirement, command, directive, advice, guidance, suggestion, recommendation, or critique from Defendants (including any business plans, strategic plans, policies, or procedures created or issued by Defendants) relating to the servicing of student loans.

REQUEST No. 74: All documents and communications that refer or relate to Defendants' internal policies and procedures concerning any requisite information necessary for a borrower to provide to Defendants in order to access that borrower's records through Defendants' website, Online Portal, telephone, chat, and/or all other available options (e.g., log-in information, system requirements, and biometric authentication requirements to gain access to/through the smartphone application developed and copyrighted by Defendants titled "Navient" for iOS (Apple based systems), Android OS, and/or Windows Mobile OS), including, without limitation, Defendants' decision(s) to implement or not to implement the same, e.g., Face ID, Touch ID, facial recognition, fingerprint recognition, etc., for the years 2000 through the present.

REQUEST No. 75: All documents that refer or relate to data entry of transactions that populate the consumer-facing Transaction History on Defendants' Online Portal, including, but not limited to, daily, monthly, annual entries, and corrective entries, and changes to entries after entries have been made.

REQUEST No. 77: All documents that refer or relate to Defendants' internal policy decision(s) to alter a previously-entered transaction entry in the consumer-facing Account History section on Defendants' Online Portal.

REQUEST No. 78: All documents that refer or relate to Defendants' internal policy decision(s) to begin to add the transaction entry in Account History on Defendants' Online Portal stating: "Disbursement," "Late Fee," "Capitalization," "Adjustment," "Repayment Fee," "Payment," "Payment – Upromise," "School Refund," "Resale," and/or "Loan Sale" on previously-entered Account Histories in connection to any loans serviced by Defendants.

REQUEST No. 79: All documents reflecting any discussion, evaluation, or analysis of the adequacy, inadequacy, effectiveness, ineffectiveness, appropriateness, or inappropriateness of any requirements, instructions, policies, procedures, guidance, or training relating to Defendants' student loan servicing practices, including, without limitation: (a) all communications or analyses concerning any deficiencies or problems in such requirements, instructions, policies, procedures, guidance, or training; (b) any analysis of the impact on borrowers of such requirements, instructions, policies, procedures, guidance, or training; and (c) all communications or analyses regarding potential improvements – whether implemented or not – in such requirements, instructions, policies, procedures, guidance, or training. Such information should include, but not be limited to, the following subject matters concerning Defendants': (a) loan servicing; (b) federal and state law and regulatory compliance

REQUEST No. 80: All documents relating to the termination of Defendants' contract with the United States Department of Education relating to Defendants' servicing of federal loans.

REQUEST No. 81: All documents that refer or relate to the due date change associated with any loans serviced by Defendants.

REQUEST No. 82: All documents that refer or relate to the internal policy decision(s) to change the "Unpaid Principal" amount on monthly billing statements for any loans serviced by Defendants.

3

REQUEST No. 83: All documents that refer or relate to the creation and implementation of, and information within, www.navient.com/allocation.
REQUEST No. 84: All documents that refer or relate to the internal policy decision(s) to add the transaction entry in Account History on Defendants' Online Portal stating: "When your loan was transferred to Navient, we received the following historical transactions. However, we do not have the full details of these transactions from your prior servicer."
REQUEST No. 85: All documents that refer or relate to any policies Defendants have implemented, amended, and/or changed as a result of any litigation.
REQUEST No. 86: All documents that refer or relate to any policies Defendants have implemented, amended, and/or changed as a result of any federal action, including without limitation, compliance audits, regulatory servicing reviews, and the like.
REQUEST No. 87: All documents that refer or relate to any policies Defendants have implemented, amended, and/or changed as a result of any state action, including without limitation, compliance audits, servicing reviews, and the like.
REQUEST No. 88: All documents reflecting the provision, issuance, or communication of any instruction, requirement, command, directive, advice, guidance, suggestion, recommendation, or critique from Defendants (including any business plans, strategic plans, policies, or procedures created or issued by Defendants) relating to the servicing of student loans.
REQUEST No. 91: All documents relating to the number, percentage, or rate of borrowers with federal loans serviced by Defendants from 2000 to the present.
REQUEST No. 92: All documents relating to the number, percentage, or rate of borrowers with private loans serviced by Defendants from 2000 to the present.
REQUEST No. 93: All documents reflecting any discussion, evaluation, or analysis of errors or problems in the processing, application, or allocation of payments for student loans that were happening on a repeated, recurring, or non-isolated basis or that had been the subject of complaints/grievances from more than one consumer, including any discussion, evaluation, or analysis of the adequacy, inadequacy, effectiveness, ineffectiveness, appropriateness, or inappropriateness of any policies, procedures, practices of Defendants to prevent or reduce such errors or problems.
REQUEST No. 94: All documents containing, discussing, or reflecting any requirements, instructions, policies, procedures, guidance, or training provided to employees, agents, or subcontractors of Defendants relating to any requirement that a borrower demonstrate a certain payment history (such as making a certain number of consecutive, on-time payments) to become eligible for cosigner release for student loans.
REQUEST No. 96: All documents relating to any potential policies, procedures, practices, systems, tools, or methodologies to identify recurring payment processing errors and prevent or minimize their recurrence (whether for a single borrower or multiple borrowers) that Defendants discussed or considered but did not adopt or implement, such as systems or tools to systematically search and/or aggregate non-escalated inquiries about payment processing errors.
REQUEST No. 97: All documents showing all data collected, archived, maintained, or used by Defendants relating to the serving of student loans as respects loan repayment allocation.
REQUEST No. 99: All documents reflecting any discussion, evaluation, or analysis of errors or problems in the processing, application, or allocation of payments for student loans that were happening on a repeated, recurring, or non-isolated basis or that had been the subject of complaints from more than one consumer, including any discussion, evaluation, or analysis of the adequacy, inadequacy, effectiveness, ineffectiveness, appropriateness, or inappropriateness

of any policies, procedures, practices of Defendants to prevent or reduce such errors or problems.
REQUEST No. 105: All documents reflecting any discussion, evaluation, or analysis of the adequacy, inadequacy, effectiveness, ineffectiveness, appropriateness, or inappropriateness of any requirements, instructions, policies, procedures, guidance, or training relating to Defendants' student loan servicing practices, including, without limitation: (a) all communications or analyses concerning any deficiencies or problems in such requirements, instructions, policies, procedures, guidance, or training; (b) any analysis of the impact on borrowers of such requirements, instructions, policies, procedures, guidance, or training; and (c) all communications or analyses regarding potential improvements – whether implemented or not – in such requirements, instructions, policies, procedures, guidance, or training. Such information should include, but not be limited to, the following subject matters concerning Defendants': (a)   loan servicing; (b)   federal and state law and regulatory compliance;
REQUEST No. 106: All documents relating to the termination of Defendants' contract with the United States Department of Education relating to Defendants' servicing of federal loans.

II.   Requests for "Computer Programs and/or Systems"

REQUEST No. 8: All computer codes and/or other system for Defendants' payment application system in effect from 2000 to the present. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.
REQUEST No. 9: All computer codes, for Defendants' Online portal system in effect from 2000 to the present. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.
REQUEST No. 10: All computer codes used and/or implemented by Defendants, from 2000 to the present, in connection with the processing of any and all payments received from or on behalf of any student loan borrower. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.
REQUEST No. 11: All computer codes, used and/or implemented by Defendants, from 2000 to the present, in connection with the allocation to principal and interest (whether past, current, or future) of any and all payments received from or on behalf of any student loan borrower. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.
REQUEST No. 12: All computer codes, used and/or implemented by Defendants, from 2000 to the present, in connection with the allocation of any and all payments received from or on

5

behalf of any student loan borrower to different types of loans. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.

REQUEST No. 13: All computer codes, used and/or implemented by Defendants, from 2000 to the present, in connection with the allocation of any and all payments received from or on behalf of any student loan borrower to loans with higher (versus lower) interest rates. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.

REQUEST No. 14: All computer codes, used and/or implemented by Defendants, from 2000 to the present, in connection with the allocation of any and all payments received from or on behalf of any student loan borrower to loans with variable interest rates. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.

REQUEST No. 15: All computer codes, used and/or implemented by Defendants, from 2000 to the present, in connection with the allocation of any and all payments received from or on behalf of any student loan borrower to loans with fixed interest rates. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.

REQUEST No. 16: All computer codes, used and/or implemented by Defendants, from 2000 to the present, in connection with the allocation of any and all payments received from or on behalf of any student loan borrower to future interest owed. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.

REQUEST No. 17: All computer codes, used and/or implemented by Defendants, from 2000 to the present, in connection with the assessment of any late fees and/or other penalties on loans serviced by Defendants. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.

REQUEST No. 18: All computer codes, used and/or implemented by Defendants, from 2000 to the present, in connection with the capitalization of interest on loans serviced by Defendants. If different versions were used and/or implemented during this period, provide each and every version of computer code, application code, binary code, program, script, model, method, algorithm, and/or other system used.

III.   Requests Regarding Private Student Loans and Upromise

REQUEST No. 78: All documents that refer or relate to Defendants' internal policy decision(s) to begin to add the transaction entry in Account History on Defendants' Online Portal stating: "Disbursement," "Late Fee," "Capitalization," "Adjustment," "Repayment Fee," "Payment," "Payment – Upromise," "School Refund," "Resale," and/or "Loan Sale" on previously-entered Account Histories in connection to any loans serviced by Defendants.

REQUEST No. 92: All documents relating to the number, percentage, or rate of borrowers with private loans serviced by Defendants from 2000 to the present.

Request No. 94: All documents containing, discussing, or reflecting any requirements, instructions, policies, procedures, guidance, or training provided to employees, agents, or subcontractors of Defendants relating to any requirement that a borrower demonstrate a certain payment history (such as making a certain number of consecutive, on-time payments) to become eligible for cosigner release for student loans.